

EXHIBIT A



Melissa Rittenour, Clerk and Register, Circuit Court Montgomery County

Telephone (334) 832-1260

Montgomery County Courthouse, P.O. Box 1667, Montgomery, AL 36102-1667

TO WHOM IT MAY CONCERN:

I, MELISSA RITTENOUR, CLERK OF THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA, DO HEREBY CERTIFY THAT THE ATTACHED ARE TRUE AND CORRECT COPIES OF DOCUMENTS ON FILE IN SAID OFFICE IN THE CASE ENTITLED:

Robert Cyrus vs. Hyundai Motor Co.
CV-06-1359

IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND AND AFFIXED THE SEAL OF SAID COURT AT OFFICE IN THE CITY OF MONTGOMERY, ALABAMA, ON THIS THE 22nd DAY OF June, 2006.

Melissa Rittenour

CLERK, CIRCUIT COURT
MONTGOMERY COUNTY, ALABAMA



FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY, ALABAMA
IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, ALABAMA

ROBERT CYRUS,

Plaintiff,

vs.

HYUNDAI MOTOR COMPANY,
HYUNDAI MOBIS, INC. (formerly
known as HYUNDAI PRECISION CO.)
HYUNDAI TRANSLEAD (formerly
known as HYUNDAI PRECISION CO.
HYUNDAI MOTOR AMERICA, and
HYUNDAI MOTOR MANUFACTURING
OF ALABAMA, LLC.,

Defendants.

2006 MAY 15 PM 3:22

CASE NO.: CV-06-1359

JURY TRIAL DEMAND

SUMMONS

This service by certified mail of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO: Hyundai Motor Company
c/o National Registered Agents, Inc.
150 S Perry St.
Montgomery, AL 36104

DI

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint, to **Richard J. Stockham, III, STOCKHAM, CARROLL & SMITH, P.C.**, the attorney for the Plaintiff, whose address is: **2204 Lakeshore Drive, Suite 114, Birmingham, AL 35209**. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Melissa Pittenger
Clerk of Court

Dated 05/23/06

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PS Form 3800, June 2002	
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IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, ALABAMA

ROBERT CYRUS,

Plaintiff,

vs.

HYUNDAI MOTOR COMPANY,
HYUNDAI MOBIS, INC. (formerly
known as HYUNDAI PRECISION CO.)
HYUNDAI TRANSLEAD (formerly
known as HYUNDAI PRECISION CO.
HYUNDAI MOTOR AMERICA, and
HYUNDAI MOTOR MANUFACTURING
OF ALABAMA, LLC.,

Defendants.

CASE NO.: CV-06-1359

JURY TRIAL DEMAND

SUMMONS

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NOTICE TO:

Hyundai Mobis, Inc.
c/o National Registered Agents, Inc.
150 S Perry St.
Montgomery, AL 36104

D2

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint, to **Richard J. Stockham, III, STOCKHAM, CARROLL & SMITH, P.C.**, the attorney for the Plaintiff, whose address is: **2204 Lakeshore Drive, Suite 114, Birmingham, AL 35209**. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Melissa Pittman
Clerk of Court

Dated 05/23/06

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IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, ALABAMA

ROBERT CYRUS,

Plaintiff,

vs.

HYUNDAI MOTOR COMPANY,
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HYUNDAI TRANSLEAD (formerly
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HYUNDAI MOTOR AMERICA, and
HYUNDAI MOTOR MANUFACTURING
OF ALABAMA, LLC.,

Defendants.

CASE NO.: CV-06-1359

JURY TRIAL DEMAND

SUMMONS

This service by certified mail of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

Hyundai Translead
c/o National Registered Agents, Inc.
150 S Perry St.
Montgomery, AL 36104

D3

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Melissa Pittman
Clerk of Court *K*

Dated 05/23/06

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IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, ALABAMA

ROBERT CYRUS,

Plaintiff,

vs.

HYUNDAI MOTOR COMPANY,
HYUNDAI MOBIS, INC. (formerly
known as HYUNDAI PRECISION CO.)
HYUNDAI TRANSLEAD (formerly
known as HYUNDAI PRECISION CO.
HYUNDAI MOTOR AMERICA, and
HYUNDAI MOTOR MANUFACTURING
OF ALABAMA, LLC.,

Defendants.

CASE NO.: CV-06-1359

JURY TRIAL DEMAND

FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY
2006 MAY 15 PM 3:23

SUMMONS

This service by certified mail of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

Hyundai Motor America, Inc.
c/o National Registered Agents, Inc.
150 S Perry St.
Montgomery, AL 36104

D4

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Melissa Pittenger
Clerk of Court

Dated 05/23/06

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IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, ALABAMA

2006 MAY 16 PM 3:23

FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY

ROBERT CYRUS,

Plaintiff,

vs.

CASE NO.: CV-06-1359

HYUNDAI MOTOR COMPANY,
 HYUNDAI MOBIS, INC. (formerly
 known as HYUNDAI PRECISION CO.)
 HYUNDAI TRANSLEAD (formerly
 known as HYUNDAI PRECISION CO.
 HYUNDAI MOTOR AMERICA, and
 HYUNDAI MOTOR MANUFACTURING
 OF ALABAMA, LLC.,

Defendants.

JURY TRIAL DEMAND

SUMMONS

This service by certified mail of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

Hyundai Motor Manufacturing Alabama, LLC
 c/o Richard E. Neal
 700 Hyundai Blvd.
 Montgomery, AL 36105

D5

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint, to **Richard J. Stockham, III, STOCKHAM, CARROLL & SMITH, P.C.**, the attorney for the Plaintiff, whose address is: **2204 Lakeshore Drive, Suite 114, Birmingham, AL 35209**. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Melissa Pittman
 Clerk of Court

Dated 05/23/06

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PS Form 3800 June 2002

See Reverse for Instructions.

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IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, ALABAMA

ROBERT CYRUS,

Plaintiff,

vs.

HYUNDAI MOTOR COMPANY,
 HYUNDAI MOBIS, INC. (formerly
 known as HYUNDAI PRECISION CO.)
 HYUNDAI TRANSLEAD (formerly
 known as HYUNDAI PRECISION CO.
 HYUNDAI MOTOR AMERICA, and
 HYUNDAI MOTOR MANUFACTURING
 OF ALABAMA, LLC.,

Defendants.

CASE NO.: CV-06-1359

JURY TRIAL DEMAND

FILED
 CIRCUIT COURT OF
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COMPLAINT

1. Plaintiff Robert Cyrus is over 21 years of age and a resident citizen of Montgomery County, Alabama.
2. Defendant Hyundai Motor Company (HMC) is a corporation, and at times relevant this complaint, was doing business in Montgomery County, Alabama. Defendant Hyundai Mobis, Inc, formerly Hyundai Precision Co., (MOBIS) was at times relevant to this complaint, doing business in Montgomery, Alabama. Defendant Hyundai Translead, Inc., formerly Hyundai Precision Co., (TRANSLEAD) was at times relevant to this complaint, doing business in Montgomery, Alabama. Defendant Hyundai Motor America at times relevant to this complaint was doing business in Montgomery County, Alabama. Defendant Hyundai Motor Manufacturing of Alabama, LLC. at times relevant to this complaint was located at, and had its principal place of business in Montgomery, Alabama.
3. Plaintiff was employed at Mercedes Benz U.S. International, Inc. in the fall of 2001

when he was approached by Hyundai Motor Company to come to work for Hyundai as the head of purchasing for a new start up operation; building Hyundai automobiles in the United States.

4. After several overtures from Hyundai, in April, 2002 Mr. Ted Chung came to Birmingham, Alabama and met with plaintiff Robert Cyrus. Chung said he was the Executive Vice-President of Hyundai Motor Company, Procurement Division as well as the Executive Vice-President of the Management Administration Division of Hyundai Precision Co. He represented to Cyrus that he was the son-in-law of the chairman of the board of Hyundai Motor Co, and so Cyrus could rely on what he said.

5. Chung told Cyrus that Hyundai was starting a new project, called Project "V", or "V" Project. He told Cyrus that this would be the first automobile manufacturing facility in the United States for Hyundai Automobiles. He told Cyrus that he was looking to hire him as the first American employee of this new start-up project.

6. Chung made several promises to Cyrus in order to persuade him to give up his job at Mercedes and come to work for Hyundai. Chung told Cyrus that he would come to work for Hyundai, and his employment would initially be with Hyundai Motor America for administrative purposes and then he would become an employee of the legal entity that Hyundai formed to run the manufacturing plant. Chung told Cyrus that no matter what form the new entity took that Cyrus would always be the top American employee in that project. Chung told Cyrus that he would be hired as the director of purchasing for the new Santa Fe (CM) / Sonata project (NF) , and that he would be responsible for direct purchasing of parts and components only. Chung told Cyrus that for the first two years after the new entity was formed and came into existence that it would have a Korean Vice-President of Procurement to whom Cyrus would report, and that Vice-President, in

eligible to receive. The offer further set out that when Hyundai Motor Manufacturing Alabama becomes a viable and legal business entity that his benefits with HMA would cease and his benefits would be provided by Hyundai Motor Manufacturing of Alabama. Duckworth told Cyrus that these benefits were to at least the same as Hyundai Motor America's benefit package. The offer letter also reflected that he was eligible for annual bonuses.

11. This offer was subject to further negotiation regarding compensation which resulted on May 20, 2002 in an addendum to the offer letter of May 16, 2002. With respect to the bonus, it was agreed that Cyrus would receive bonuses based on 225% of his monthly salary. This promise of a bonus based on 225% of his monthly salary was a material inducement for Cyrus leaving Mercedes and going to work for Defendants.

12. On May 21, 2002, relying on the promises made by Ted Chung and Keith Duckworth plaintiff quit his employment of 8 years with Mercedes Benz U. S. International, Inc., and accepted employment with Hyundai. Cyrus began working for Hyundai Motor America on May 22, 2002.

13. In September 2002 the new legal entity was created for the Hyundai manufacturing plant. It was called Hyundai Motor Manufacturing Alabama, LLC., and it was a corporation with its principal place of business in Montgomery, Alabama. At that time Plaintiff was transferred on paper from Hyundai Motor America to Hyundai Motor Manufacturing Alabama LLC (HMMA). At HMMA Plaintiff reported to Vice-President of Procurement Mark Lee, the Korean Vice-President that Ted Chung had told him he would report to. Ted Chung became the Executive Vice President for Procurement for HMMA. At that time HMMA reaffirmed the agreement between Cyrus and Hyundai Motor America.

14. Though plaintiff was repeatedly commended for his good work , accomplishments

and performance, he was not given an annual performance evaluation.

15. Plaintiff was given a signing bonus, but he was never given the bonus of 225% of his monthly salary that he had been promised.

16. In October 2003, Plaintiff spoke to Greg Kimble, Director of HR for HMM A, about his not getting the promised bonus. Kimble told him to be patient, that they were working on it. Kimble acknowledged at that time to Cyrus that the bonus was due.

17. In April 2005 after plaintiff had not received bonuses in either 2003 or in 2004 as he had been promised he spoke with Mark Lee, Vice-President of Procurement for HMMA about this and also put his concerns in writing and attaching the offer letter and addendum showing where the bonus had been promised to him. Lee acknowledged that the company owed Cyrus for the bonuses. Despite Lee's acknowledgment that the bonuses were owed, Cyrus was never paid the bonuses.

18. Cyrus was not promoted to the position of Vice-President of Procurement after 2 years, in September 2004, as he had been promised by Chung. Vice-President Mark Lee remained in the position until 2005. Even when Mark Lee was transferred back to Korea Plaintiff was not promoted to Vice-President of Procurement of HMMA.

19. Defendants never intended to promote Cyrus to the position of Vice President of Procurement of Hyundai Motor Manufacturing Alabama, LLC. In 2005 Keith Duckworth was made Deputy President and Chief Executive Officer of Hyundai Motor Manufacturing Alabama, LLC. In the fall of 2005 Cyrus spoke with Duckworth about concerns he had with a new Korean Manager. Duckworth told Cyrus that everyone in management thought Cyrus was doing an outstanding job. Cyrus spoke to Duckworth about not getting promoted to the position of Vice President of Procurement as Ted Chung had promised. Duckworth said he never heard Chung say anything about

that.

COUNT I

20. Plaintiff adopts and realleges each and every material averment as if specifically set out herein:

21. Defendants breached their contract with plaintiff when they failed to pay him the bonuses promised.

22. As a consequence of Defendants' breach of contract plaintiff has suffered damages. WHEREFORE, plaintiff demands judgment against defendants for unpaid bonuses, plus interest.

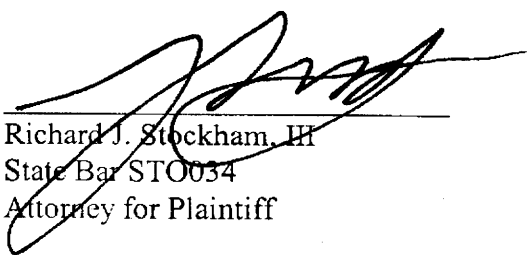
COUNT II

23. Plaintiff adopts and realleges each and every material averment as if specifically set out herein.

24. Defendants made representations and/or suppressed facts upon which plaintiff relied and/or acted to his detriment. Said representations and/or suppressions were false and were made willfully, and/or wantonly, and/or recklessly and/or with a disregard to their truth, and knowing that Plaintiff was relying on them to be truthful and forthcoming. Defendants are guilty of deceit.

25. As a result of defendants' misrepresentations, suppressions and deceit plaintiff has suffered injuries, including pecuniary loss, mental anguish and emotional distress.

WHEREFORE, plaintiff demands judgment against defendants for compensatory and punitive damages.


Richard J. Stockham, III
State Bar STO034
Attorney for Plaintiff

Plaintiff demands trial by struck jury on all issues triable to a jury.

SERVE DEFENDANTS BY CERTIFIED MAIL AT:

Hyundai Motor Manufacturing Alabama LLC
c/o Richard E. Neal
700 Hyundai Blvd.
Montgomery, AL 36105


Hyundai Motor Company
c/o National Registered Agents, Inc.
150 S Perry St.
Montgomery, AL 35104

Hyundai Mobis, Inc.
c/o National Registered Agents, Inc.
150 S Perry St.
Montgomery, AL 35104

Hyundai Translead
c/o National Registered Agents, Inc.
150 S Perry St.
Montgomery, AL 35104

Hyundai Motor America, Inc.
c/o National Registered Agents, Inc.
150 S Perry St.
Montgomery, AL 35104

J-H

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1. Article Addressed to: Hyundai Motor Manufacturing Alabama LLC c/o Richard E. Neal 700 Hyundai Blvd. Montgomery, AL 36105		B. Received by (Printed Name) Larry Grache	C. Date of Delivery
		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No S & C DS CN-06-1359	
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		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	

2. Article Number
(Transfer from service label)

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5-26-06

p- Robert Cyrus
d- Hyundai Motor Corp